

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 09-11705-NG

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JONATHAN GREEN	)
	)
	)
Plaintiff.	)
	)
	)
V.	)
	)
CITY OF BOSTON; EDWARD DAVIS, in his capacity as CHIEF OF THE BOSTON POLICE DEPT; TIMOTHY McCARTHY, individually and in his official capacity as an Employee, Agent, and/or Officer of the BOSTON POLICE DEPARTMENT	)
Defendants.	)
	)

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**PARTIES' JOINT STATEMENT**

Pursuant to the Court's Notice of Scheduling Conference and in accordance with Fed. R. Civ. P. 16(b) and Local Rule 16.1, counsel for the above-named Parties have conferred and propose the following pretrial schedule:

1. Joint Discovery Plan and Motion Schedule:
  - a. Automatic disclosures to be completed on or before June 18, 2010;
  - b. Written fact discovery requests are to be served by February 28, 2011 and answers/responses are to be served within the time provided by the rules;
  - c. All fact depositions are to be completed by March 2, 2011, except for expert witnesses;
  - d. The Plaintiff's expert witnesses shall be designated by March 2, 2011 and Defendants' expert witness shall be designated within thirty (30) days after Plaintiff discloses said expert(s) as contemplated by Fed. R. Civ. P. 26 (b) (4) (A); designation of experts shall include provision of any information required by the Federal Rules of Civil Procedure

and/or the local Rules of the District of Massachusetts; any expert depositions shall be completed within thirty (30) days of Defendants' expert designation;

- e. All dispositive motions are to be filed by April 4, 2011, and responses are to be filed thirty days thereafter pursuant to Local Rule 7.1;
- f. A status conference shall be held on March 3, 2011 to determine a date necessary for a hearing on dispositive motions and schedule a final pre-trial conference date.

  

2. The parties do not consent to trial by Magistrate Judge.
3. The Plaintiff has not yet submitted a settlement proposal to Defendants.
4. Defendants will consider the settlement proposal and formulate a response in reasonable time after receipt.
5. Certifications regarding each parties' consultation with counsel regarding budgets and alternative disputes resolution will be filed separately.

Respectfully submitted,

PLAINTIFF, JONATHAN GREEN

By his attorney

/s/ Gordon W. Spencer

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Gordon W. Spencer  
945 Concord Street  
Framingham, MA 01701  
(508) 231-4822  
BBO #630488

Respectfully submitted,

CITY OF BOSTON; EDWARD DAVIS, in his capacity, and  
TIMOTHY MCCARTHY, in his official and individual capacity

William F. Sinnott

By their attorneys

/s/ Alexandra Alland

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Alexandra Alland  
Assistant Corporation Counsel  
City of Boston Law Department  
1 City Hall Plaza, Room 615  
Boston, MA 02201  
(617) 635-4031  
BBO # 661474

Dated: September 22, 2010